

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	
v.)	Civil Action No. 21-cv-00260
)	
LBRY, INC.,)	
)	
Defendant.)	
)	

**AMICUS CURIAE NAOMI BROCKWELL’S ASSENTED TO
MOTION FOR ORDER PERMITTING REMOTE PARTICIPATION BY HER
COUNSEL IN THE JANUARY 30, 2023 HEARING**

Amicus Curiae Naomi Brockwell respectfully requests that this Court allow her local counsel, William S. Gannon, Esq., to participate remotely in the hearing scheduled for January 30, 2023 at 3:00 p.m. by telephone or video because (a) local counsel expects that if this court permits amici counsel to make substantive arguments during the hearing, any arguments on behalf of Ms. Brockwell will be made by Attorney Deaton who has been admitted pro hac vice and (b) Attorney Gannon is in the State of Florida although he recognizes his responsibility to attend the hearing in person unless otherwise permitted by the court.

Attorney Peter Moores, counsel to the Securities & Exchange Commission, consents to Attorney Gannon participating in the hearing remotely. Attorney Moores has asked Attorney Gannon to advise this court that the Securities & Exchange Commission does not consent at this time to substantive amici arguments.

Although Attorney Jennifer L. Parent, counsel to amici Investor Choice Advocates Network, takes no position on the motion and has advised Attorney Gannon that her client will not seek to argue at the hearing, she did authorize Attorney Gannon to answer the question in the cm/ecf filing program “Is the Motion FULLY assented to” by checking the “Yes” box in an email sent at 4:57 pm today.

WHEREFORE, Amicus Curiae Naomi Brockwell respectfully requests this Court to:

- A. Order that her counsel may appear and participate remotely in accordance with such instructions and requirements as this Court may issue and impose; and
- B. Grant such further relief as may be fair and equitable, just or lawful.

Respectfully submitted,

Dated: January 25, 2023

/s/ William S. Gannon
William S. Gannon, NH Bar 892

Counsel for:

NAOMI BROCKWELL

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CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing motion on all persons and entities named on the CM/ECF Electronic Service List by causing it to be filed electronically via the CM/ECF filing system.

DATED: January 25, 2023

/s/ William S. Gannon
William S. Gannon